



Department of Health and Environment

Azzie Young, Ph.D., Secretary

Reply to: (913) 296-1604 Fax Number: (913) 296-1592

October 18, 1991

Steve Keiter Hydrocarbon Recyclers, Inc. 2549 N. New York Wichita, Kansas 67219

Re: Hazardous Waste Compliance Inspection EPA Identification Number KSD007246846

R00001674 RCRA Records Center

Dear Mr. Keiter:

On September 10, 1991, your facility was inspected to determine compliance with the state hazardous waste regulations.

The inspection revealed that your facility generates and/or stores a variety of hazardous wastes as defined by 40 CFR, Part 261, Subparts C & D as adopted by K.A.R. 28-31-3. A Partial list is as follows:

Wastes Generated

equipment

Waste Codes

	Chlorinated solvents Tetrachloroethylene contaminated wastes (carbon, cartridge filters, water)	F001/F002 F002
4. 5.	Flammable waste water Solvents and solvent/paint mixtures Oxidizers (Class 1 and 2 only) Nonblendable wastes	D001/D007/D008 D001/F003/F005 D001 D004/D005/D006/ D007/D008/D009/
7.	Blendable wastes for kiln fuel	D010/D011 D001/F001/F002/ F003/F005/U- listed/D004 to D011
8. 9.	Corrosives Contaminated floor sweepings, protective clothing and sampling	D002/D007 D001/D001/F001/ F006

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The quantity of hazardous waste generated is more than 1,000 kilograms (approximately 2,200 pounds) per month. Therefore, your facility is considered an EPA generator and is regulated un K.A.R. 28-31-4 excluding K.A.R. 28-314(h) and (m). Your facility is also an interim status storage, treatment or disposal facility (T/S/D) and is subject to K.A.R. 28-31-8. In addition, your facility is the marketer of hazardous waste fuels and is subject to 40 CFR, Part 266 as adopted by K.A.R. 29-31-8b.

The inspection identified the following items not in compliance with state regulations concerning generators of hazardous waste:

- 1. Four (30 gallon) drums of hazardous waste (floor sweepings) in Building D and one (55 gallon(drum in Building C did not have the accumulation start date on the containers as required by K.A.R. 28-31-8(b).
- 2. One container (box) of hazardous waste (journal pads) in Building D was not labeled with the words "Hazardous Waste" as required by K.A.R. 28-31-8(b).
- 3. One (55 gallon) drum of combustible liquid in Building C was severely dented and was seeping. One (55 gallon) drum of waste carbon in Building D had a hole in the container. One (cardboard) container of D008 waste in Building D was in poor condition. The contents of these containers were not transferred to a good container as required by 40 CFR, Part 265.171 as adopted by K.A.R. 28-31-8(a).
- 4. The date and nature of any repairs or other remedial actions were not recorded in the weekly inspection logs as required by 40 CFR, Part 265.15(d) as adopted by K.A.R. 28-31-8(a).
- 5. Adequate aisle space was not maintained to allow the unobstructed movement of personnel and equipment in an emergency as required by 40 CFR, Part 265.35 as adopted by K.A.R. 28-31-8(a).

Our department will expect these deficiencies to be corrected by November 15, 1991. Please identify, in writing, the action you have taken to correct these deficiencies.

During the inspection, we requested an explanation of the circumstances surrounding the two shipments of hazardous waste from Mexico to your facility in Wichita. We received this information in a letter dated September 23, 1991 from Ron Robertson, Facility Safety and Compliance Officer. This information is under review and will be addressed in separate correspondence.

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If you have any questions concerning this inspection, please call me at (913) 296-1604.

Sincerely,

Ronald L. Smith

Environmental Technician

Inspections and Enforcement Section Bureau of Air and Waste Management

rs/hri

c: Steve Broslavick

Tom Gross Teresa Hansen



Kansas Department of Health and Environment Bureau of Air and Waste Management Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/ Transporter Compliance Inspection Report

General					
	*			AM Date 9-10-	
acility Name Hy	drocarbon Recyclers,	Inc.	EPA ID I	No. KSD007246846	
Street25	49 N. New York	City	Wichita	, KS Zip	67219
Mailing Address (if c	lifferent than above)				
County Se	dgwick		_ Phone (268-9490	
Contact(s)S	teve Keiter, Facility	Manager			
. Ro	on Robertson,				
	on Smith, Teresa Hans		<i>t</i> .		
Type of Business _	Commercial T/S/D -	- Hazardous Waste	e Fuel Marke	ter.	
Has the company d If yes, explain.	eclared any information/pro	cesses as trade secre	ts (K.S.A. 65-34	17)? Yes	No .
		}*			
M.Macatalaideir alkaireann	stes Generated * stes first) *A7	so See Attached	List of Wast	e Codes.	·
Waste:		Chlorinated So	lvents	Tetrachloroethyle contaminated was (carbon, filters	tes
If waste is hazardo	us, give H.W. ID Number:	F001/F002		F002	
Amount generated	per month:	va j			
Amount presently	in storage:		: •		
Accumulation time):				
Present disposal n	nethod:	HRI, Tulsa, O		Systech, Fredon	ia, Ks.
			· .		

Waste:		1 **
	Flammable Wastewater	Solvent and paint solvent mixture (kiln fuel)
If waste is hazardous, give H.W. ID Number:	D001/D007/D008	D001/F003/F005
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Incineration - Rollins Deep Well Injection	Systech, Fredonia, Ks.

Waste:		
	0xidizers	Non-blendable Wastes
4 %		
If waste is hazardous, give H.W. ID Number:	D001	D004 - D011
Amount generated per month:		300. BOIL
Amount presently in storage:		
Accumulation time:		
	· · · · · · · · · · · · · · · · · · ·	
Present disposal method:	Incineration - Rollins or Ensco.	USPCI, Lone Mountain, OK. Incineration - Rollins or Ensco.

Waste:		
	Blendable Wastes for Kiln Fuel	Corrosives
If waste is hazardous, give H.W. ID Number:	D001/F001/F002/F003/F005 Approved U wastes, D004 -	D002/D007
Amount generated per month:	D011	
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Systech Endonia Ka	
	Systech, Fredonia,Ks. and Heartland Cement, Independent	USPCI, Lone Mountain, OK. ence
	(12)	

Waste:	Non-hazardous waste- water	Used Oil		
If waste is hazardous, give H.W. ID Number:	none 🎉	none	<u> </u>	
Amount generated per month:				
Amount presently in storage:				
Accumulation time:		•		-
Present disposal method:	USPCI, Lone Mountain, Ok or incineration	Systech, Fredor	nia, Ks.	
I. Has the facility evaluated all potentially (K.A.R. 28-31-4(b)) A. If waste(s) was tested, was the ana (K.A.R. 28-31-4(f)) B. If waste(s) was tested, are the resu	llysis conducted by a laboratory cert	ified by KDHE? Yes) No	NA NA
II. If hazardous waste(s) is disposed of via Works (POTW) has written permission (K.A.R. 28-31-3/40 CFR 261.4)	a the sanitary sewer to a Publicly Ow been obtained from the operator of Non-hazardous wastes	the POTW? Yes	No (NA)
 If industrial waste(s) is disposed of at a authorization been obtained? (K.A.R. 2 A. If yes, list the authorization numbe 	permitted sanitary landfill, has a dis 8-29-23)	posal Yes	No (NA
IV. Facility size classification: Not a Gen. Small Qt. T/S/D Facility Transport	-	∑ EPA Gen. eter ☐ Used oil Bur	ner/Marketer	
Hazardous Waste Determination Requireme	ents: X Adequate	☐ Inadequa	te	
Notification Requirements				
V. Has generator Notified KDHE and obta 28-31-4(c))	ained an EPA Identification Number?	Yes Yes	No No	NA
VI. Is current Notification accurate? (K.A.F. A. Is this facility marketing (selling) h. B. Is this facility marketing (selling) u. (If yes, to either question A or B, comp.)	azardous waste as a fuel?	Yes Yes ers Checklist.)	No No No	NA NA NA
C. Is this facility burning hazardous v D. Is this facility burning used oil as a	vaste as a fuel? a fuel?	Ye: Ye:		NA NA
Notification Requirements:	X Adequate	e Inadequa	ate \Box	NA

(If small quantity generator, stop here.)

IVI	ITITESTS			
VII.	Is a contractual agreement used in place of manifesting? (K.A.R. 28-31-4(c))			
	A. If yes, does the contractural agreement include the type of waste and frequency of	Yes	(No)
	B. If yes, is the vehicle used to transport the waste owned and operated by the reclaimer	Yes	No	(NA)
	C. If yes, is a copy of the agreement kept for a period of three years after termination of agreement?	Yes	No	WA
VIII.		Yes	No	(NA)
¥111.	Is a current manifest showing revision date and burden disclosure statement used? (K.A.R. 28-31-4(d)/40 CFR 262.20)	. Yes	No	NA NA
	A. If yes, does manifest(s) include:			
	 Generator EPA Identification Number (twelve digit) and manifest document number (five digit)? 	· ·		
	2. Number of pages?	Yes	No	NA
,	3. Generators name and mailing address?	Yes	No	
	4. Generators phone number?	(Yes)	No	
•	5. Transporter 1 Name?	(Yes)	No	
	6. Transporter 1 EPA Identification Number?	(Yes)	No	
	7. Transporter 2 Name?	(Yes)	No	
	8. Transporter 2 EPA Identification Number?	(Yes)	No	NA
i um er	9. Name and site address of designated facility?	(Yes)	No	NA
	10. Designated facility's EPA Identification Number?	Yes)	No	
	11. Waste Description (DOT shipping name, hazard class, and Identification Number)?	(Yes)	No	
	12. Number and type of containers?	(Yes)	No	•
	13. Total Quantity?	(Yes)	No .	Σ.
	14. Unit (weight or volume)?	Yes	No	
	15. Special handling instructions?	(Yes)	No	,
•	16. Generators certification including waste minimization statement, generators signature and date?	(Yes)	No	NA
	17. Name, signature and date of transporter 1?	Yes	No	
	18. Name, signature and date of transporter 2?	(Yes)	No	
В	Does generator retain a copy of manifest(s) stempt to the control of the copy of manifest(s) stempt to the copy of manifest (s) stempt to the copy of manife	(Yes)	No	NA
		(Yes)	No	
	Does generator retain copy of manifest(s) signed and dated by T/S/D/ facility owner/operator for three years? (K.A.R. 28-31-4(f)(1)(A))	(Yes)	M-	
D.	Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment?	\bigcirc	No	
	1. If Yes, was exception report(s) filed? (K.A.R. 28-31-4(f)(4))	Yes	(No)	
	2. If Yes, was copy retained for 3 years? (K.A.R. 28-31-4(f)(1)(B))	Yes Yes	No (NA)
Manifa		1 62	No (NA)
waines	ting Requirements:	equate		

Land	d Disposal Restric	tions Requirem	ients	·				
IX.	Does facility generate an 40 CFR 268, Subparts B List these wastes:	and U?		• •		Yes	No	
	A. All Wastes.		D			- .		
						-		
	B		F			_		
					· 			
X.	Is the waste(s) covered A. If Yes, describe the	variance, extension, o	r petition which	applies:	R 268 5&6)	Yes	(No)	•
				•	<u> </u>			 -:
•								
XI.	Is the waste covered by		∵. FR 268.1(c)(3))	a a se x L		Yes	No	
711.	A If you door the gen		e with the wast	e to the T/S/D facilit	y stating (a)(3))	Yes	No	NA
XII.	Does generator ship wa treatment or disposal?			•		Yes	No	
	 A. If Yes, does the ger hazardous waste no waste analysis data 	nerator provide a Notif umber(s), applicable t , if available? (40CFR	reatment stark	'/S/D facility that inclards, manifest num	ludes: EPA ber(s), and	Yes	No	·
	B. If yes, is a copy of t	his notification kept fo	or 5 years?	· si, . 🕹		Yes	No	
XIII.	Does generator treat re restrictions standards?	stricted waste(s) on-s (If Yes, fill out land dis	ite so that they sposal restriction	are below the land ons checklist.)	disposal	Yes.	No	Net T
Lar	nd Disposal Restrictions F	lequirements:			☐ In	adequate		□NA
L								•
Pre	e-Transport Requi	rements						
XIV.	Does generator packa 28-31-4(e)(1))	ge waste in accordand	ce with DOT re	quirements? (K.A.R.	· 1. 2.	Yes	No	NA
XV.	Does generator label (DOT requirements of 4	flammable liquid, pois 9 CFR 172.101 or 172	on, etc.) each 2.102? (K.A.R. 2	package in accorda 28-31-4(e)(2))	ince with	Yes	No	NA
XVI.	Does generator mark (package in accordance 28-31-4(e)(3))	consignee's or consige with DOT requireme	gnor's name ar ents of 40 CFR	nd address, etc) on 172 Subpart D? (K./	each A.R.	Yes	No	N/
	,	ark each container of (3))	110 gallons or	less as below?		Yes	No	NA
		Hazardous Was If found, contact the nea	te-Federal Law Pro arest police or pub	phibits Improper Dispos lic safety authority or th	al. e U.S. EPA.			
		G	enerator's Name	and Address				
			Manifest Docume	nt Number				
		ر ا						

XVII.	Does generator have placards to off Subpart F? (K.A.R. 28-31-4(e)(4))	er to transporters in accordance with 49 CFR	172		· •.
XVIII			(Van)	No.	ŊA NA
Pre-Transport Requirements: Adequate Inadequate					
•		TZ) Nocquate	Inadequate		NA
Bie	nnial Reports				
XIX.	Has generator submitted a biennial re	eport(s) to KDHE? (K.A.R. 28-31-4/5/2))			
	A. If Yes, does generator retain copi	ies for three years? (K.A.R. 28-31-4(f)(1)(B))	\succ	No No	NA NA
Bien	nial Report Requirements:	⊠ Adequate	Inadequate		
Spe	cial Conditions				
XX.	Has generator received or transported (40 CFR Subpart E)	l any hazardous waste to or from a foreign so	urce? (Yes) *	No ·	
,	A. If Yes, has generator filed a Notice	with the Secretary of Health and Environmen			
i	 B. Is waste manifested and signed by 	a foreign consignee?		(No)	NA
	C. If generator transports wastes out shipment been received?	of the country, has confirmation of delivered	Yes	No	NA
	· · · · · · · · · · · · · · · · · · ·		Yes	No :	(NA)
Specia	al Conditions Requirements:		- Inadamusta	. '<	
					NA
Stora	age Requirements				
XXI. D	Ooes generator temporarily store waste	before transport?			1 -1 000000
В	For more than 90 days?		\sim		NA
C				NO ,	NA
				No	NA
				Yo)	NA
		- (- a, a, i, 20-0 i - 4(d)(i) Ot (b)(1)(B)(<i>,</i>	
	4. Does denerator conduct woolds:				NA
	a. If Yes, are these inspections dispection, full name of inspection.	ocumented in a log that includes date and time etor, notations of observations, and date and A.R. 28-31-4(d)/40 CFR 265.15(d))	ne of	10 }	NA ,
	- Sulogial apriolitis (V	٠٠٦٠١٠ حق-15(d)/40 CFR 265.15(d))	(Yes) N	io A	VΔ

. 5 .	Are cor feet) fro 28-31-4	ntainers holding ignitible or reactive waste(s) located at least 15 meters (50 pm the facility's property line? (EPA Generator and T/S/D Only) (K.A.R. 4(g)(1))	Yes	No	NA
6.	contair	e in containers is incompatible with other materials stored nearby, are the ners separated from the other materials by means of a dike, berm, wall, or neans? (K.A.R. 28-31-4(g)(1) or (h)(1)(B))	Yes	No	NA
7.	Does g	generator have any satellite storage areas? (K.A.R. 28-31-4(j))	(Yes)	No	NA
	a. Is the	the waste stored in a container at or near the point of generation and under econtrol of the operator of the process generating the waste?	Yes	No	
	b. Is	the container in good condition and closed except to add or remove waste?	(Yes)	No	
	c. Is	the container marked with the words: "Hazardous Waste"?	(Yes)	No	
	d. Is	the container marked with the accumulation start date at the time it becomes	Yes	No	
	e. Is	the full container moved to the storage area within 3 days after it became full?	(Yes)	No	
ų	(If was	ste(s) is placed in tanks, piles, or surface impoundments complete the priate inspection checklist.)		., .	

Stora	age Requirements:	Adequate	Inadequate	□NA
Kan	sas Generator's Emergency Preparedn	iess -		
XXII.	Has facility named one employee as emergency coord	inator? (K.A.R. 28-31-4(h)(1)(E	Yes	No.
	A. Is the emergency coordinator available to respond facility within a short period of time?			No
	B. Is the emergency coordinator or his/her designee emergencies (fires, spills, or releases) that arise?	prepared to respond to any	Yes	No
	C. Is the emergency coodinator familiar with the repo 28-31-4(h)(2)?	rting requirements of K.A.R.	Yes	No
XXIII.	Is the following information posted next to at least one asscesssible in an emergency: (K.A.R. 28-31-4(h)(1)(F)	telephone which is immediate))	aly	
	A. Name and telephone of emergency coordinator?		Yes	No
	B. Location of fire extinguishers, fire alarms, or spill of	control material, if available?	Yes	No
	C. Telephone number of fire department unless the fa		Yes	No NA
XXIV.	Have employee's been trained so that they are familial emergency procedures that are relevant to their responserations? (K.A.R. 28-31-4(h)(1)(G))	r with proper waste handling a naiblities during normal facilit	and Yes	No
	A. Is this training documented in any way?		Yes	No
Kar	nsas Generator's Emergency Preparedness Requiremen	nts: Adequate	Inadequate	□NA

(If Kansas generator, stop here.)

Preparedness and Prevention If appropriate, based upon the nature and quantity of wastes generated and stored at the A. Internal communication or alarm system easily accessible in case of emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(a)) Yes B. Telephone or hand-held two-way radio capable of summoning emergency response No NA personnel? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(b)) Yes Portable fire extinguisher, fire control equipment, spill control equipment, and No NA decontamination equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(c)) Yes D. Is water of adequate volume provided for hose streams, foam producing equipment, No NA sprinklers, etc.? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(d)) Yes No Is this equipment (A-C above) tested and maintained to assure its proper operation? NA (K.A.R. 28-31-4(g)(4)/40 CFR 265.33) Yes No NA XXVI. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.35) Yes No NA XXVII. If appropriate for the type(s) of waste handled, has the owner/operator made the following A. Familiarized the local emergency authorities with the facility, wastes handled, entrances . and exits? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(1)) Yes Designated one authority where one or more police or fire departments might respond No NA to an emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(2)) Yes C. Made agreements with local emergency response teams, emergency response No NA contractors, and equipment suppliers? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(3)) Yes No D. Familiarized local hospitals with the properties of hazardous waste handled and types of injuries which could result from fires, explosions, or releases at the facility? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(4)) Yes No NA XXVIII. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(b)) Yes No NA Preparedness and Prevention Requirements: Adequate JInadequate NA Personnel Training XXIX. Has the owner/operator established a hazardous waste management training program? (K.A.R. 28-31-4(g)(4)/40 CFR 265.16) Yes No Is the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2)) Yes No B. Are new personnel trained within six months after their employment? (40 CFR 265.16(b)) Yes No C. Are new employees supervised until training is completed? (40 CFR 265.16(b)) Yes No D. After initial training, are employees trained on an annual basis? (40 CFR 265.16(c)) Yes No

	E .	Does the facility maintain the following documents and re	ecords:		•		
	1.	Job title and job description for each position related t management? (40 CFR 265.16(d)(1) & (2))	o hazardous waste	A •	Yes	No	
	2.	 Description of type and amount of training to be given (40 CFR 265.16(d)(3)) 	each person?		Yes	No	
	3.	. Records of training given to facility personnel? (40 CF	FR 265.16(d)(4))		Yes	No	
Pers	onne	l Training Requirements:	Adequate	☐ Inac	dequate		
		**					
Cor	ıtinç	gency Plan					
XXX.	Doe If ye	es the facility have a contingency plan? (K.A.R. 28-31-4(g))(4)/40 CFR 265 Subp	art D)	Yes	No	
	A.	Does the plan list the names(s), home address, and pho emergency coordinator(s) in the order in which they sho (40 CFR 265.52(d))	ne numbers of desigrould be contacted?	nated	Yes	No	
\cdot λ_z	В.	Is an emergency coordinator available at all times? (40	CFR 265.55)	•	Yes	No	
	C.	Does the plan describe emergency actions facility perso fires, explosions, or releases of hazardous waste? (40 C	onnel must take to res FR 265.52(a))	pond to	Yes	No	
	D.	Does the plan describe arrangements made with emerge (40 CFR 265.52(c))	ency response agenc	ies?	Yes	No	
	E.	Does the plan include a list of all emergency equipment physical description of each item on the list, and a brief (40 CFR 265.52(e))	at the facility, its loca outline of its capabilit	tion, a ies?	Yes	No 8 /	
	F.	Does the plan include an evacuation plan for facility per and evacuation routes? (40 CFR 265.52(f))	sonnel that describes	signals	Yes	No	
	G.	Have copies of the plan been provided to outside emerghospitals? (40 CFR 265.53)	gency response agen	icles and	Yes	No	
		المراقع الم	and the second s	y y waterie	41	•	
Co.		ency Plan Requirements:	Adequate	Ina	adequate		

(If EPA generator, stop here.)

W. Gillot	NJUGI NEUUNGIUGNE ************************************					
	orter Requirements					
XXXI. Doe If ye	es this facility transport hazardous waste? es,			Yes	No	Maria .
A.	Are they registered as a hazardous waste to 28-31-6 (b))	ransporter in the State of Kansa	as? (K.A.R.	Yes	No	
B.	Does transporter comply with the manifest 263.20(h)?	requirements of 40 CFR 263.20	except			
C.	Does transporter retain a copy of the manife	est for three years? (40 CFR 26	3.22(a))	(Yes)	No	
<i>ا</i> . ن	Does this facility transport hazardous waste 28-31-4(d)(7)? If yes,	subject to the manifest exemp	tion of K.A.R.	Yes	No (No))
1.	Does the transporter record the name, ac generator, quantity of waste shipped, DO waste was accepted in a log or shipping	ddress, and EPA ID number of t T shipping information, and the	he date the	. •		'
2.				Yes	No	(1
3.				Yes	No	(
Franconorte	n Daniel		* *	Yes	No	(4
Tansporte	er Requirements:	X Adequate	☐ Ina	dequate		∃N
			1978		iji k	
Å	Additional inform	ation and conclu	sions:			
A	Additional inform	ation and conclu	sions:			
.	Additional inform		sions:			·
A	Additional inform			# 1		
A						

MIKE HAYDEN
GOVERNOR
JACK D WALKER M'D
Secretary

STATE OF KANSAS



Forbes Field Tope+a KS 66620-0001 (913) 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

RCRA Compliance Inspection Report T/S/D Facilities Checklist

		1/3/6			
Α.,	<u>General</u>		0.20 AM	EPA ID No	KSD007246846
	Date 9-10-91	Time			
•	Facility Name_	Hydrocarbon Re	cyclers, Inc.	•	
4	Street	2549 N. New Yo	rk		
	City	Wichita			67219
	County	Sedgwick		Phone (316) 26	8-9490
	Contact	Steve Keiter,	Facility Man	ager	
	.5-	Ron Smith, Ter	resa Hansen,	Siew Kour	
	Inspector				
	Other				
"3. ~	Activity at S		3torage		<u> Oisposal</u>
	<u>emreen.</u>				Incineration
	Chem/Phys	:/Bio Treatment	χ Đrums		<u>Landfill</u>
	Filtratio	חכ			Land Treatment
	Incinera	Lion		ce Impoundment	Burface Impound
	Recycling	g/Recovery	X Tank,	Above ground	·
	Reproces		Tank,	, Below ground	Other (
	X Solvent		Other	r()	
	Thermal	Treatment			
	Volume	Reduction			
*.	Waste 0	il ·			
	Other ()			

		Comments:	
•	٠		•
•			
	С.	Waste Analysis Plan	-
265.13		 Does facility maintain a copy of its waste analysis plan at the facility? 	YES) NO
		A. If yes, does the plan include:	
		 Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters. 	YES NO
		Test methods which are used to test for these parameters.	YES NO
		Sampling method used to obtain sample.	YES NO
	•	 Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current. 	YES NO
•		 For off-site facilities, the waste analyses that generators have agreed to supply. 	YES NO (NA)
		5. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest.	VES 40 4A
Waste analysis	nsic	requirements	
[X] Adequ		[] Inadequate	
265.14	2.	Security 1. Does the facility provide either of the following:	
•		a. A 24-hour surveillance system? (T.V. monitoring or guards).	YES NO
		b. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, T.V. monitoring, locked entrance, con- trolled roadway access).	(ES) 40

Does the facility provide warning signs at entrances.

YES) 1

3. Does the facility consider itself exempt from security requirements?

Security requirements:

[X] Adequate [] Inadequate [] Not Applicable

E. General Inspection Requirements

Does the owner/operator maintain a written schedule at the facility for inspecting:

at the facility for inspecting.

a. Monitoring equipment

b. Safety and emergency equipment

c. Security devices

d. Operating and structural equipment

2. Does the inspection schedule identify the types of problems which are to be looked for during the inspections?

3. Does the owner/operator maintain an inspection log?

a. If yes, does the log contain the:

Date and time of inspection

1. Name of inspector

Notation of observations

Date and nature of repairs or remedial action

YES) NO

YES NO

YES) NO

(YES) NO

YES NO

(YES) NO

YES) NO

(YES) 310

YES NO

YES (NO)

Inspection requirements:

[] Adequate [X] Inadequate

F. Personnel Training

155.15 1. Soes the owner/operator maintain at the facility, the following documents and records:

	b. Description of type and amount of training to be given each person.	YES NO
	c. Records of training given to facility personnel.	YES NO
Personnel training	ng requirements:	
[X] Adequate	[] Inadequate	
G.	Requirements For Ignitable, Reactive, or Incompatible Waste	es
265.17	1. Does the facility handle ignitable or reactive wastes?	YES) NO
	a. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spon- taneous ignition, and radiant heat?	YES) NO NA
	2. Are smoking and open flames confined to specially designated locations?	YES) NO NA
	3. Are "No Smoking" signs posted in hazard areas?	YES) NO NA
•	4. Does a check of these areas show any leakage or corrosion of containers?	(ES) NO NA
	5. Does a check of these areas show evidence of heat generation from interaction of incompatible wastes?	YES NO NA
Idnitable reactiv	· · · · · · · · · · · · · · · · · · ·	
	/e, or incompatible waste requirements:	
[X] Adequate	[] Inadequate [] Not Applicable	
н.	Preparedness and Prevention	
265.31	Does an inspection of the facility show any evidence of fire, explosion, or contamination?	YES (NO)
255.32	2. If applicable to the facility, is the facility equipped with:	<i>,</i>
·	a. Internal communication or alarm system easily accessible in case of emergency?	AH OL (221)
	5. Telephone, hand-held two-way radio capable of summoning emergency response personnel?	(E3) HO NA

a. Job title and job description for each position related to hazardous waste management.

•			
/n	3.	Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided?	YES NO NA
	4.	Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.?	YES NO NA
265.33	5.	Is this equipment (1-4 above) tested and maintained to assure its proper operation?	YES NO NA
265.35	6.	Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment?	YES NO NA
265.37	7.	If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes?	YES NO NA
:×	8.	- where more than one police and fire depart-	YES NO (NA)
		If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers?	YES NO NA
••	10	if appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility?	VES NO NA
	11	In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record?	YES NO NA
		·	

Preparedness and prevention requirements:

262.52

 			
[] Adequate	[X] Inadequate		
Ĭ.	Contingency Plan and S	mergency Procedures	
262.53		olan maintained at the facility a provided to outside agencies which n to provide emergency services?	
			• •

 Does the plan describe arrangements made with amergency response personnel?

	.	3.	Does the plan list the name(s), home address, and phone number(s) of the designated emergency coordinator(s)?	YES	NO .	•
•	265.55	4.	Is an emergency coordinator available at all times?	YES	NC-	
		5.	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities?	(YES)	МО	
•		6.	Does the plan include an evacuation plan for facility personnel?	YES	NO	
Con	tingency plan a	and e	mergency procedures requirements:			
	[X] Adequate		[] Inadequate			
	J.	Man	ifest System, Recordkeeping, and Reporting			
	265.71	1.	Does the facility receive waste from off-site?	YES	NO	
			a. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter?	YES	NO	NA
			b. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery?	(/ <u>E</u> S	40	HA
·.,			c. Does the owner/operator retain a copy of manifest?	(YES)	NO	NA
		2.	Does the facility receive any waste from a rail or water (bulk shipment) transporter?	/ES	();())
			a. If yes, is the shipment accompanied by a shipping paper containing the appropriate information?	/E 3	И0	(NA
			 If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy? 	f E S	NO	();;
		e e e	 Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery? 	YES	, NO	(\frac{1}{4})
			3. Does the owner/operator retain a copy of the shipping paper?	YES	10	44
,	365.72	3.	Has the facility received any shipments of waste which were inconsistant with the manifest?	(*E\$)	.10	

If yes, was an attempt made to reconcile the dis-YES) NO crepancy with the generator and transporter? a. If no, was the Regional Administrator notified? YES NО Does the owner/operator keep a written operating record NO 265.73 at the facility? If yes, does the operating record include: A description and the quantity of each hazardous waste received, and method(s) and date(s) of its NO NA treatment, storage, and disposal? 2. The location of each hazardous waste within the NO facility and the quantity at each location? NO NA YES Records and results of waste analyses? 3. Reports and details of incidents requiring im-NO YES plementation of the contingency plan? NO Records and results of required inspections? NO NA Monitoring, testing, or analytical data? Closure cost estimates (and for disposal NO NA facilities, post-closure cost estimates)? Has the facility received any waste, which does not fall under the small generator exclusion, not ac-265.76 companied by a manifest or snipping paper? If yes, was an unmanifested waste report submitted YES .10 to the Regional Administrator? Manifest system, recordkeeping, and reporting requirements: [] Inadequate. [X] Adequate

. Closure and Post-Closure

265.112 l. Does the owner/operator have a written closure plan for the facility?

YES NO

a. If yes, does the plan include:

1. A description of how and when the facility will be closed?

<u>ES</u>) :'0

				A description of the steps essary to completely close the facility?	YES).	NO	
			3.	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life?	YES	NO	•
	•		4.	A description of the steps needed to decontaminate facility equipment at the time of closure?	YES	NO	
	•		5.	An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress?	YES	NO	
.	265.118			facility is a disposal facility, does the perator have a written post-closure plan?	YES	МО	N/
			a. If y	yes, does the plan include:			
			1.	Ground-water monitoring activities and frequencies at which they will be performed?	YES	NO	(NA
** .			2.	Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment?	YES	МО	(N/
		·	3.	The name, address, and phone number of the person or office to contact during the post-closure period?	YES	NO	(N)
Clos	ure and post-c	losur	e requi	rements:			•
	[X] Adequate	Ę] Inade	equate	· .		
	<u>.</u>	Fina	ncial R	equirements			
	265.142	1.		e owner/operator have a written estimate of sure cost?	YES	NO	
•	255.143	2.	surance	owner/operator established financial astor facility closure and notified the ladministrator? (Required after 1-6-82).	(13)	ИО	
	255.144	3.	owner/o	facility is a disposal facility, does the perator have a written estimate of the annual post-closure monitoring and maintenance of ility?	YES	NO	(N/

YES NO (NF

- 265.145
- 4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82)

YES NO (N.

- 265.147
- 5. Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1
 million with an aggregate of at least \$2 million
 exclusive of legal defense costs? (Effective
 7-15-82).

YES) NO

6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? (Effective 7-15-82)

YES NO (NA

Financial requirements:

[X] Adequate

[] Inadequate

M. Management of Containers

- 265,170
- 1. Are containers presently used to store hazardous waste?



- a. If no, do not complete questions 2-5.
- If yes, check condition of containers and for evidence of incompatibility of waste with containers.

Condition of Containers:

- [] Adequate [X] Inadequate [] Not Applicable
- 265.173

 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste?
- (55) 10
- 265.174

 3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors?
- (E3) 40 .i

	265.176	4.	Are containers located at leaproperty line?	ast 15 meters (ible or r 50 feet)	eactive waste from the facili	ty's (YES) N	IO NA
	265.177	5.	materials stor open tanks, or separated from	red nearby, in r surface impou	other con undments, terials by	e with other tainers, piles, are the contain means of a dik	ers .e,	AN ON
			perm, waii, o	Cities devices		transles (co.		
Mana	agement of						·	
	[χ] Adequ	ate .	[] Inadequate	[] Not App	plicable			· · · · · · · · · · · · · · · · · · ·
	Note:	Determ	ine if owner/op	erator claims	any infor	mation confiden	tial.	
	Note:	Fill o	ut applicable c tanks, surface lls, groundwate	hecklists for impoundments,	specific piles, la	facility types	·	
	Additiona	al Infor	mation and CONC	LUSIONS				
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Hydrocarbon Recyclers, Inc. Wichita, Kansas September 10, 1991

Building D:

Four (30 gallon) drums of hazardous waste (floor sweepings) in Building D did not have the accumulation start date on the containers.

One container (box) of hazardous waste (journal pads) was not labeled with the words "Hazardous Waste".

One (55 gallon) drum of waste carbon had a hole in the container.

One (cardboard) container of D008 waste was in poor condition.

Building C

One (55 gallon) drum did not have the accumulation start date on the containers.

One (55 gallon) drum of combustible liquid was severely dented and was seeping.

Part A Application dated 5/9/91 Addendum A September 11, 1991 Page 2

Hazardous Waste Container Storage (S01) Buildings²

STORAGE BUILDING	STORAGE AREA (sq ft)	STORAGE CAPACITY (gal)	DRUM EQUIVALENTS (55 gal)
Building D	13,803	46,640	848
Processing Area	6,278	9,900	180
Building C	13,520	99,110	1,802
Drum Dock	2,660	14,960	272
Building B	7,304	55,000	1,000
Building I	5,292	38,720	704
Building I	6,318	27,940	508
Gondola Storage Area (Proposed)	1,152	9,680	176
TOTAL	56,327	301,950	5490

- Footnote 1. Total Tank Capacity = Working capacity of hazardous waste storage tanks only; processing tanks and product tanks are not included in this table.
- Footnote 2. Total Container Storage Capacity = Maximum storage capacity calculated using *55 gallon drum equivalents"; greater numbers of approved containers may be stored in any building so long as total permitted capacity of 170,000 gallons will not be exceeded; the total capacity shown for each building will provide for processing flexibility.



Kansas Department of Health and Environment Bureau of Waste Management Forbes Field, Topeka, Kansas 66620 (913) 296-1600

Tank Inspection Checklist

Own	er Info	rmation							
Date	9-10-9	1	EPA I.	D. No	KSD007246846	5			
Facility Na	ame	Hydrocarbon R	ecyclers, I	Inc.	· · · · · · · · · · · · · · · · · · ·	·			
Street	· · · · · · · · · · · · · · · · · · ·	2549 N. New Y	ork					·	
City	·	Wichita		· · · · · · · · · · · · · · · · · · ·	, Kans	sas Zip	67219	<u>.</u>	
Tank	Inforn	nation		Varia					
	-	Tank #1		Tank #2		Tank #3			
Descriptio	on:	SEE ATTACHED	SHEET.		,				
Capacity:	•								
Substance	e Stored:								
Waste Co	de:				•				
Location:							e e		
Exist	ing Ta	nk System	(s)			•			
l. Is	the tank(s)	labeled with the wo	ords "Hazardou	us Waste"? (K.	A.R. 28-31-4)		Yes	No	
wi	ith a spill co	is not covered, doe ontainment system would provide? (40	with a capacity	that equals o	•	• • • •	Yes	No	NA
	Is the tank(s) equipped with a waste-feed cutoff or bypass system(s) as required by 40 CFR 265.192(b and d)?							No	
IV. Ar	re daily insp	ections made of al	systems perti	nent to the pro	oper operation of	the tank?	Yes	No	
A	Dischar	ge and cutoff syste	ms?			•	Yes	No	NA
B.	. Tank lev	vel and freeboard?		•		and a	Yes	No	(NA)
	. Drainag	je systems?					Yes	No	(NA)

	D.	Above-ground portions corrosion?	Yes	No	. NA
	E .	Monitoring and leak detection equipment?	Yes	No	NA [.]
	F.	Secondary containment?	Yes	No	NA
V.	Are	these inspections documented in a log?	Yes	No	
	A.	In the case of a permitted T/S/D facility, do they follow the inspection schedule outlined in their permit?	Yes	No	NA
VI.	Has was	the tank(s) been used to treat or store wastes substantially different from previous tes or have substantially different treatment processes been used in the tank(s)?	Yes	No	
	A.	If yes, were waste analyses and trial treatment or storage tests conducted prior to implementing the proposed changes and is all the data kept on file in the facility operating record or was written, documented information on similar storage or treatment process changes obtained prior to implementing the proposed changes and is all documentation kept on file in the facility operating record?	Yes	No ;	NA
VII.	With	the exception of emergency situations, have <u>ignitable</u> or reactive wastes been placed in tank(s) by the facility?	Yes	No	NA
	A.	If yes, has the facility insured the safety of the operation by one or both of the following methods (40 CFR 265.98)?			
		1. Was the waste treated immediately before or after being placed in the tank(s) so that it is no longer ignitable or reactive and such treatment is done in compliance with the safety requirements of 40 CFR 265.15(b)?	Yes	No	NA
		2. Was the waste stored or treated under protected conditions eliminating the possibility of ignition or reaction?	Yes	No	NA ·
VIII.	if a mee	covered tank(s) is used to treat or store ignitable or reactive wastes, does the facility at the NFPA buffer zone requirements? (40 CFR 265.198(b))	Yes	No	NA
IX.	tank	compatible waste materials are placed in the same tank(s) or are put in a contaminated (s), is this done under completely controlled and safe conditions as specified in 40 CFR 199?	Yes	No .	NA)
X.	If the	e tank(s) has cathodic protection systems, is it inspected according to the following edule (40 CFR 265.195(b))?	Yes	No	NA)
	A. ,	Was proper operation confirmed within 6 months of installation and annually thereafter?	Yes	No	(NA)
	В.	Are induced current sources inspected/tested at least bimonthly?	Yes	No	(NA)
	C.	Are records maintained of these inspections?	Yes	No	(NA)
XI.	Was	the tank(s) used for the management of hazardous waste prior to July 14, 1986?	Yes	No -	NA NA
	A.	If yes, does the tank system(s) have secondary containment?	Yes	No	NA
	В.	If no, has a written assessment that attests to the integrity of the tank(s) been prepared by an independent registered engineer?	Yes	No	NA
If yes,	did th	e assessment include the following: 1. Design standards according to which the tank and ancillary equipment were	Yes	No .	

constructed?

			*		
,			* !		
	. 2.	Existing corrosion protection measures?	Yes	No	NA
•	· · 3.	Hazardous characteristics of the waste to be handled?	Yes	No	
	4.	Documented age of the tank system (if available) or estimate of the age?	Yes	No	
	5.	Results of a leak test, internal inspection, or other tank integrity examination? (If the results of this test show the tank to be leaking or unfit for use, the owner must implement 40 CFR 265.196.)	Yes	No	
	6.	is the leak test conducted annually by an independent, qualified, registered engineer? (40 CFR 265.193(i)(1) and (2))	Yes	No	
	7.	Are records of the assessment results maintained on file at the facility?	Yes	No	
Exi	sting Tan	k System(s) Adequate		Inadeo	 quate
	1				
Ne	w Tar	nk System(s)			
XII.		nk system(s) required to have secondary containment (new system or according to e in 40 CFR 265.193(a)(1 through 5)?	Yes	No	
-		res, has the owner or operator requested a variance from the secondary ntainment? (40 CFR 265.193(g and h)	Yes	No	NA
	B. If y	res, does the secondary containment meet the following minimum requirements? (40 R 265.193(b and c)	÷		

		the results of this test show the tank to be leaking or unfit for use, the owner must implement 40 CFR 265.196.)			
	6.	Is the leak test conducted annually by an independent, qualified, registered engineer? (40 CFR 265.193(i)(1) and (2))	Yes	No	
	7 .	Are records of the assessment results maintained on file at the facility?	Yes	No	
:hedule da	ate wh	nen secondary containment is required per schedule in 40 CFR 265.193(a) (1 through	າ 5)		
Existing 7	Tank	System(s) Adequate		Inadeq	uzte
lew T	an	k System(s)			
		system(s) required to have secondary containment (new system or according to in 40 CFR 265.193(a)(1 through 5)?	Yes	No	
A.		s, has the owner or operator requested a variance from the secondary ainment? (40 CFR 265.193(g and h)	Yes	No	NA
В.	If ye	s, does the secondary containment meet the following minimum requirements? (40 265.193(b and c)			`
	1.:	Constructed of or lined with materials compatible with the waste and of sufficient strength?	Yes	No	NA
	2.	Placed on a structurally adequate foundation?	Yes	No	NA
,	3.	Provided with a leak detection system capable of detecting releases within 24 hours?	Yes	No	NA
e e e e e e e e e e e e e e e e e e e	4.	Adequately sloped or designed and operated to drain and remove liquids from leaks, spills or precipitation?	Yes	No	NA
C.		s, does the secondary containment include one of the following: (40 CFR 193(d))	•	. •	
	1.	External liner?	Yes	No	NA
	2 .	Vault?	Yes	No	NA
	3.	Double-walled tank?	Yes	No	NA
	4.	Equivalent device approved by the Secretary?	Yes	N D	NA

265.193(e)) For External Lines and Vaults Adequate capacity to contain 100% of the largest tank within its boundary? No NA Yes Designed or operated to prevent infiltration of precipitation into the containment No NA 2. system unless it has adequate capacity to contain a 25 year, 24 hour rain event? No NA Free of cracks or gaps? 3. No NA Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs? For Vaults No NA Constructed with chemical-resistant water stops at all joints? No NA Provided with an impermeable coating or lining over the concrete? 2. NA Protected against vapor ignition, if required due to the waste characteristics? Yes No 3. Yes No Provided with an exterior moisture barrier? For Double-Walled Tanks No Designed as an integral structure for containment of releases? Yes 1. Yes No If metal, is it protected from corrosion, if metal? 2. Provided with a built-in continous leak detection system capable of detecting Yes No 3. releases within 24 hours? Is ancillary equipment provided with adequate secondary containment? (40 CFR 265-193(f)) No Yes NA XIII. Has the tank system or secondary containment system had a leak or spill or was it Yes No NA XIV. determined to be unfit for use? Yes If yes, was it immediately removed from service and appropriate follow-up actions taken as required by 40 CFR 265.196 (b through e)? If extensive repair has been conducted on the tank system was it recertified in accordance Yes No XV. with 40 CFR 270.11(d) and such certification submitted to the Secretary within 7 days? (40 CFR 265.196(f)) ☐ Inadequate New Tank System Requirements Comments:

If yes, does the secondary containment satisfy the following requirents: (40 CFR

D.

Hazardous Waste Tank Storage (S02) Service¹

VESSEL	CAPACITY - WORK (gal)	CAPACITY - MAX (gal)	LOCATION
V-1	7,181	7,363	Process Area
V-2	7,084	7,084	Ргосеза Агва
V-3	7,181	7,363	Process Area
V-4	7,181	7,363	Process Area
V-\$	20,895	20,895	Process Area
V-6	20,895	20,895	Process Area
v-7	7,181	7,363	Process Area
V-8	7,181	7,363	Process Area
V-9	5,078	. 5,078	Building D
V-10	5,078	5,078	Building D
V-11	5,078	5,078	Building D
V-12	5,078	5,078	Building D
V-13	5,078	5,078	Building D
V-14	5,078	5,078	Building D
V-15A	2,659	2,659	Building D
V-15B	2,659	2,659	Building D
V-15C	2,6\$9	2,659	Building D
V-15D	2,659	2,659	Building D
V-16	9,028	9,028	Building D
V-17	522	522	Process Area
V-18	489	489	Building D
V-26	1,129	1,155	Process Area
V-29	90	90	Building D
V-30	90	90	Building D
V-31	115	115	Building D
V-32	, 115	115	Building D
V-34	539	539	Process Area
TOTAL	138,000	138,936	N/A

***P088**-

***PO87-**

☆ ₽ ∩ 85-

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	J085 -	- ,	* U086 -	- ,	≉U087 −	-	•
	J088 -	- .	¢U089-	- ,	≠ U090−		<u> </u>
	J091-		*U092-	 •	*U093-	<u> </u>	•
	J091- J094-	₹ •	*U095-	- ,	≠ U096 ~		<u>.</u>
			*U098-		≠U099 -		1
	J097 -		* U102 −		* ∪103 -	-	,
	J101-		#U106−	en e	⊅U107-	-	•
	J105-	- 7	‡U109−		*U110−		<u></u>
	U108-		\$U112- 00000000	04.53600-501.502.	*U113-	-	•
	U111-	_ ,	*U115-	- ,	‡U116 →	-	•
*	U114-				*U119-		1
	U117- 00000000004.5		#H121- 00000000	04.53600-501.502.	‡U122 −		•
	U120-	- ,	*U124-	- •	‡U125 −	-	•
	U123-	- ,	*U127-	<u> </u>	*U128		•
	U126-		<u>~0127-</u> ¢U130-		≠U131-	•••	•
	U129-	- ,		v	≉U134 -	-	•
	U132-	- ,	#U133- #U136-	· ·	* ∪137-	-	<u>, </u>
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*	U150-	- ,	*U151-	- \$02 - 102-00A53. AD	*U155-	-	_1
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 \$0168-	- • •	#U169 →	- ,	 \$U170 −	- ,	
⊅U171- 0000000	004.53600-S01,S02,	¢U172 −	- ,	*U173-		
♥U174 -	-	≎U176 -	- ,	≠U177	- ,	
 0178-	- · · · · · · · · · · · · · · · · · · ·	≎U179 -	- ,	‡U180−	- ,	
 \$∪181-	- •	≎U182 -	- ,	#U183 ~	- •	
#U184 -	- ,	· ≑U185 −	- ,	\$U186 −	- ,	
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*U202-	- ,	≑U203 −	- ,	≎U204 -	- ,	
 4U2O5−	- ,	≎U206 −	- ,	*U207-	- ,	
 \$U208−	- ,	 \$U209 −	- ,	#U210- 000000	0022.68000-501.502.	
*U211- 0000000	022,68000-501,502,	≑ U212 -	- ·	*U213-	- ,	
#U214-		≎U215 -	- •	 \$U216−	-	
 \$U217 -	-	≎U218 −	- , '	*U219-	•	
*U220- 0000000	004.53600-\$01.802.	*U221-	- ,	 \$U222 −	- ,	·····
 \$U223−		≄ U225 −	- . ,	≉U226− 000000	0022.68000-\$01.502.	
 \$U22 7−	- ,	≎U228- 0000000	022.68000-\$01,\$02,	*U234 -	- ,	
≎U235 −	•	≉ U236 −	7	*U237 -	• •	• .
. ⊅ J238- 0000000	004.53600-501.502.	*U239- 0000000	004.53600-501.502.	#U240 −	- ,	
¢U243 −	 • • •	≎U244 -	- ,	 \$U246 -	- ,	•
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Hydrocarbon Recovery Services

23 September 1991

Mr. Ron Smith, Environmental Technician Kansas Department of Health and Environment Bureau of Waste Management Forbes Field, Building 740 Topeka, Kansas 66620-0002

Dear Mr. Smith:

As you requested during your 10 September 1991 inspection of the Hydrocarbon Recyclers, Inc. of Wichita facility, this letter responds to the question of whether HRI of Wichita has received waste from a foreign source. HRI of Wichita has not received waste from a foreign source, but it has received material generated by Everco de Mexico from a hazardous waste transfer facility, namely Hydrocarbon Recyclers, Inc. in Tulsa, Oklahoma.

The Oklahoma Commissioner of Health was given notice of the shipment more than four weeks in advance of the date the wastes were expected to arrive at HRI in Tulsa. Notice was given via the generator's Disposal Plans required to be submitted and approved by the Commissioner of Health prior to treatment or disposal of the wastes (per Oklahoma State Department of Health Industrial Waste Management Rule 300).

The material was shipped under a mailing address in El Paso, Texas, from a "maquiladoros" (assembly) plant in Juarez, Chihuahua, Mexico. Such plants are operated by United States corporations whereby almost all raw materials used in the plants originate from the United States and, under Mexican law, all wastes generated by the plants must be returned to the United States.

The material received at HRI of Wichita was accompanied by two manifests: Texas manifest number 129808, originally dated 11 August 1989; and Texas manifest number 129810, originally dated 8 August 1989. In both cases the shipments were manifested to HRI in Tulsa but, because fingerprint samples from each waste stream had pH results too high for acceptance at Tulsa, several drums were rejected and sent to HRI of Wichita as an alternate facility.

Please call Steve Keiter or me if you have any additional questions regarding this subject.

Sincerely,

Ron Robertson

Facility Safety and Compliance Officer

